

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION

IN RE: C.R. BARD, INC., PELVIC
REPAIR SYSTEM PRODUCTS LIABILITY
LITIGATION MDL NO. 2187

IN RE: AMERICAN MEDICAL SYSTEMS, INC., PELVIC
REPAIR SYSTEM PRODUCTS LIABILITY
LITIGATION MDL NO. 2325

IN RE: BOSTON SCIENTIFIC, PELVIC
REPAIR SYSTEM PRODUCTS LIABILITY
LITIGATION MDL NO. 2326

IN RE: ETHICON, INC., PELVIC
REPAIR SYSTEM PRODUCTS LIABILITY
LITIGATION MDL NO. 2327

IN RE: COLOPLAST PELVIC
REPAIR SYSTEM PRODUCTS LIABILITY
LITIGATION MDL NO. 2387

IN RE: COOK MEDICAL, INC, PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY LITIGATION MDL NO. 2440

IN RE NEOMEDIC PELVIC REPAIR SYSTEM
PRODUCT LIABILITY LITIGATION MDL NO. 2511

THIS DOCUMENT RELATES TO ALL CASES

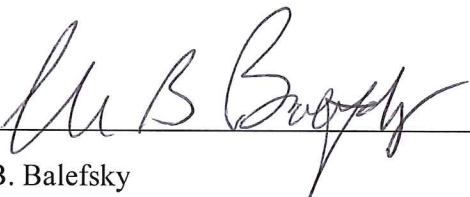
**AFFIDAVIT OF LEE B. BALEFSKY IN CONNECTION WITH THE
MOTION FOR APPOINTMENT OF A NEW SPECIAL MASTER**

I, Lee B. Balefsky, aver:

I. INTRODUCTION

1. I am a partner with the law firm of Kline & Specter, P.C. (“Kline & Specter”).
2. This Affidavit is based upon personal knowledge.

3. On January 3, 2019, I, along with Kline & Specter named-Partner Shanin Specter, participated in a meeting by way of teleconference with Judge Daniel J. Stack regarding the Pelvic Mesh Fee and Cost Committee's recommendations for Kline & Specter.
4. During the January 3, 2019 meeting, Judge Stack said the following:
 - a. Judge Stack sat in on the FCC meetings regarding the recommendations.
 - b. Judge Stack signed the preliminary recommendations by the FCC.
 - c. Judge Stack stated that he "probably should not have" signed the recommendations.
 - d. Judge Stack stated that he has "no opinion on the appropriateness of the fees", however he gave his input and participated in the committee deliberations.
 - e. Judge Stack stated that he "didn't feel comfortable signing" the preliminary recommendations.



Lee B. Balefsky

Kline & Specter, P.C.

2/14/19
Date

Sworn and subscribed before me
this ^{14th} day of February 2019.



Danielle Serad

